

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
2015 DEC 14 PM 1:43

TRACY ARTHUR ALSTON,)
)
Plaintiff,)
)
v.)
)
EXPERIAN INFORMATION)
SOLUTIONS, INC., et al.,)
)
Defendants.)
_____)

Civil Action No.

CLERK'S OFFICE
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NOTICE OF REMOVAL

Defendant, Equifax Information Services LLC ("Equifax"), by Counsel, and hereby file this Notice of Removal of this action from the Circuit Court for Prince George's County, Maryland, wherein it is now pending as Case No. CAL15-32758, to the United States District Court for the District of Maryland. This Notice of Removal is filed pursuant to 28 U.S.C. §§ 1332, 1441, and 1446. In support hereof, Defendants show this Court as follows:

1. An action was filed on November 5, 2015 in the Circuit Court for Prince George's County, Maryland, entitled *Alston v. Experian Information Solutions, Inc., et al.*, Case No. CAL15-32758 (the "State Court Action").
2. Equifax was served with the Complaint on November 13, 2015.
3. This Notice is being filed with this Court within thirty (30) days after Equifax was served with a copy of Plaintiff's initial pleading setting forth the grounds for her action and her claims for relief.
4. This Court has original jurisdiction over this case pursuant to 28 U.S.C. § 1331, in that this is a civil action arising under the Constitution, laws or treaties of the United States;

specifically 15 U.S.C. § 1681 *et seq.*, otherwise known as the Fair Credit Reporting Act (“FCRA”), as follows:

(a) Plaintiff’s Complaint, on its face, alleges a violation of the FCRA. (See Plaintiff’s Complaint).

(b) The FCRA, pursuant to 15 U.S.C. § 1681(p), provides that any action alleging a violation of its provisions “may be brought in any appropriate United States district court without regard to the amount in controversy . . .”

(c) Removal of this case is also proper pursuant to 28 U.S.C. § 1332, on the basis of diversity of citizenship.

5. Promptly after the filing of this Notice of Removal, Equifax shall give written notice of the removal to Plaintiff and to the Clerk of the Circuit Court for Prince George’s County, Maryland, as required by 28 U.S.C. § 1446(d).

6. Attached hereto, as Exhibit A, are copies of the Summons and Complaint served upon Equifax in the State Court Action.

7. All Defendants consent to the removal of this case. Attached hereto, as Exhibit B, is the Joinder and Consent of codefendant Experian Information Solutions, Inc.

WHEREFORE, Equifax requests that the above-described action be removed to this Court.

Respectfully submitted this 14th day of December, 2015.

/s/ Nathan D. Adler
Nathan Daniel Adler
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Attorneys for Equifax Information Services LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of December, 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system and served a copy by U.S. Mail to the following:

Tracy Arthur Alston
10012 Cedarhollow Lane
Largo, Maryland 20774

/s/ Nathan D. Adler
Nathan Daniel Adler